



July 18, 2007

Mr. Matt McClincy
Oregon Department of Environmental Quality
Northwest Region
2020 S.W. Fourth Avenue
Suite 400
Portland, Oregon 97201-4987

Subject: Quarterly Progress Report for April through June 2007
Acid Plant Area RI/FS, Arkema, Inc., Portland Plant

Dear Mr. McClincy:

Paragraph 11(H) of the Voluntary Remedial Investigation/Feasibility Study (RI/FS) Agreement for the Arkema Inc. (Arkema; formerly ATOFINA Chemicals, Inc.) Acid Plant Area, dated August 26, 1998, requires submittal of quarterly progress reports. The following progress report summarizes activities for the period of April through June 2007.

1. Actions Taken Under Agreement During the Quarter (April through June 2007)

Between April 2 and 12, 2007, a geotechnical investigation was performed at the Site in support of the Groundwater Source Control Interim Remedial Measure (IRM) as described in *Scope of Work for Geotechnical Evaluation and Slurry Compatibility Testing in Support of the Groundwater Source Control Interim Remedial Measure*.

Between April 2 and 20, 2007, a round of site-wide groundwater monitoring was performed as described in *Groundwater Monitoring Work Plan, Site Wide Groundwater Monitoring Program* and revised per agreement with Oregon Department of Environmental Quality (ODEQ).

On April 10, 2007, Legacy Site Services LLC (LSS) submitted *Groundwater Treatability Study Work Plan, Groundwater Source Control Interim Remedial Measures*.

On April 25, 2007, LSS submitted the quarterly progress report for site activities occurring from January through March 2007.

In April, laboratory bench scale treatability testing was initiated as described in *Groundwater Treatability Study Work Plan, Groundwater Source Control Interim Remedial Measures*.

On May 7, 2007, a regional groundwater level measurement event coordinated by ODEQ was conducted for all site wells. The groundwater level data were submitted to ODEQ on May 21, 2007.

In May, laboratory bench scale slurry compatibility testing was initiated in support of the Groundwater Source Control Interim Remedial Measure (IRM) as described in *Scope of Work for Geotechnical Evaluation and Slurry Compatibility Testing in Support of the Groundwater Source Control Interim Remedial Measure*.

On June 5, 2007, stormwater samples were collected from Outfalls 001 through 002. This collection represents the fourth and final stormwater sampling event. This work was performed in accordance with the *Stormwater Interim Remedial Measures (IRM) Work Plan*, dated June 2006.

On June 27, 2007, representatives from ODEQ, LSS, Environmental Resources Management (ERM), and Integral met to discuss the status of various activities at the Arkema Portland site.

A groundwater flow model for the site continued to be prepared in support of the groundwater source control IRM.

2. Actions Scheduled for the Next Quarter (July through September 2007)

The Quarterly Progress Report for the period of July through September 2007 will be prepared.

A Stormwater Data Report (describing the data from the catch basin sampling and the four stormwater sampling events) will be prepared.

LSS will meet with ODEQ to discuss the Stormwater IRM for the Site.

A revised figure presenting the March 2007 Riverbank Soil Sampling locations will be produced.

The riverbank soil data will be used in the preparation of the Upland Human Health Risk Assessment and Level II Ecological Risk Assessment analyses.

Results from the April groundwater monitoring event will be presented as described in *Groundwater Monitoring Work Plan, Site Wide Groundwater Monitoring Program* and revised per agreement with ODEQ.

Laboratory bench scale slurry compatibility testing will continue to be undertaken in support of the Groundwater Source Control IRM as described in *Scope of Work for Geotechnical Evaluation and Slurry Compatibility Testing in Support of the Groundwater Source Control Interim Remedial Measure*.

Laboratory bench scale groundwater treatability testing will continue in support of the Groundwater Source Control IRM as described in *Groundwater Treatability Study Work Plan, Groundwater Source Control Interim Remedial Measures*.

A groundwater flow model for the site will continue to be prepared in support of the groundwater source control IRM.

LSS will submit responses to ODEQ and United States Environmental Protection Agency (USEPA) comments received on May 29, 2007 regarding the *Draft Groundwater Source Control Evaluation, Arkema Portland Facility*.

Representatives from ODEQ, LSS, ERM, and Integral will meet in July to discuss the status of various activities at the Arkema Portland site.

3. Summary of Validated Data

The validation of the Riverbank Soil data (March 2007 sampling event) was completed in June 2007. These data are included as Attachment A.

The validation of the Stormwater data (collected on February 15th and March 2nd and 19th) was completed during this quarter.

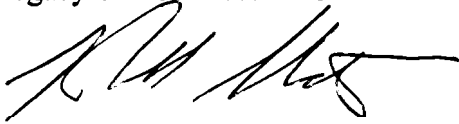
4. Problems Experienced During Previous Quarter

During the June 5, 2007 stormwater sampling event there was inadequate rainfall and stormwater flow to collect stormwater samples from Outfalls 003 and 004. Because of the unlikely occurrence of any substantial stormwater events before Fall 2007 and because data are available for Outfalls 003 and 004 from the three previous stormwater events, no additional sampling is proposed from these outfalls at this time so as not to delay the Stormwater Interim Remedial Measure analysis.

If you have questions or comments pertaining to this progress report, please contact me at (610) 594-4430.

Sincerely,

Legacy Site Services LLC

A handwritten signature in black ink, appearing to read "J. Todd Slater", with a stylized, flowing script.

J. Todd Slater

*Manager, Environmental Technologies
and Remedial Procurement*

Attachment

cc: Larry Patterson
 Erik Ipsen, ERM
 Sean Sheldrake, EPA
 David Livermore, Integral

Attachment A
March 2007
Riverbank Soil Data